

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICHAEL CHAVEZ,

Plaintiff,

v.

AMAZON WEB SERVICES, INC., a
Delaware Corporation,

Defendant.

No. 2:21-cv-00007 BJR

**PLAINTIFF'S INITIAL
DISCLOSURES PURSUANT TO
FRCP 26(a)(1)**

Pursuant to Federal Rules of Civil Procedure 26(a)(1) and the Court's Order dated January 25, 2021, Plaintiff Michael Chavez ("Plaintiff"), by and through his undersigned counsel, hereby submits his initial disclosures as follows:

A. Presently Known Individuals Likely to Have Discoverable Information

The following individuals are believed to have information that Plaintiff may use to support his claims, although Plaintiff does not yet know the full extent of each person's knowledge.

1. Michael Chavez
c/o Mix Sanders Thompson, PLLC
1420 Fifth Avenue, Suite 220
Seattle, WA 98101

PLAINTIFF'S FRCP 26(a)(1) INITIAL DISCLOSURES – 1

Mix Sanders Thompson, PLLC
1420 Fifth Avenue, Suite 2200
Seattle, WA 98101
Tel: 206-521-5989
Fax: 888-521-5980

1 2. Samir Kopal
2 c/o Perkins Coie, LLC
3 1201 3rd Avenue, Suite 4900
4 Seattle, WA 98101

5 Mr. Kopal was a Software Development manager and a direct supervisor of Mr.
6 Chavez. Mr. Kopal has information regarding the operation of Amazon, the job
7 duties of Mr. Chavez and other information relevant to the claims and defenses
8 asserted in this matter.

9 3. Jennifer Zumek
10 c/o Perkins Coie, LLC
11 1201 3rd Avenue, Suite 4900
12 Seattle, WA 98101

13 Ms. Zumek was a Senior HR Business Partner who communicated with both Mr.
14 Chavez and Mr. Kopal regarding Mr. Chavez's request for accommodation. Ms.
15 Zumek has information regarding the operation of Amazon and other
16 information relevant to the claims and defenses asserted in this matter

17 4. Heidi Kucera Taylor
18 c/o Perkins Coie, LLC
19 1201 3rd Avenue, Suite 4900
20 Seattle, WA 98101

21 Ms. Taylor was a Senior Accommodation Consultant at Amazon who
22 communicated with Mr. Chavez regarding Mr. Chavez's request for
23 accommodation. Ms. Zumek has information regarding the operation of Amazon
24 and other information relevant to the claims and defenses asserted in this matter

 5. Christiana Manegold
 c/o Perkins Coie, LLC
 1201 3rd Avenue, Suite 4900
 Seattle, WA 98101

 Ms. Manegold was a Senior HR Business Partner at Amazon. Ms. Manegold has
 information regarding the interactions between Mr. Chavez and Mr. Kopal, the
 operation of Amazon and other information relevant to the claims and defenses
 asserted in this matter

 6. Maria Tellez
 c/o Perkins Coie, LLC
 1201 3rd Avenue, Suite 4900
 Seattle, WA 98101

 Ms. Taylor was a Program Manager at Amazon. Ms. Tellez has information
 regarding the adequacy of Mr. Chavez's performance, the interactions between
 Mr. Chavez and Mr. Kopal, the operation of Amazon and other information
 relevant to the claims and defenses asserted in this matter

 7. Yuri Ellis
 Address Unknown

Ms. Ellis was a Business Operations Manager at Amazon. It is believed that she is no longer with Amazon at this time. Ms. Ellis has information regarding the operation of Amazon and other information relevant to the claims and defenses asserted in this matter

8. Philip Fitzsimons
c/o Perkins Coie, LLC
1201 3rd Avenue, Suite 4900
Seattle, WA 98101

Mr. Fitzsimons was a Senior Manager for AWS Well-Architect Team at Amazon. Mr. Fitzsimons has information regarding the operation of Amazon and other information relevant to the claims and defenses asserted in this matter.

9. As yet identified former and current employees of Amazon who may have information regarding the operation of Amazon and other information relevant to the claims and defenses asserted in this matter.

10. Dr. Mark Holmes and/or other similarly qualified provider
Regional Epilepsy Center - Harborview
West clinic, 325 9th Ave, 4th Floor
Seattle, WA 98104

Dr. Holmes has been Mr. Chavez's treating neurologist and may testify as to his knowledge of Plaintiff's medical and treatment history before, during and after his employment at Amazon, and may be asked to provide additional opinions relevant to the claims presented in this matter.

11. Laila May Chavez
c/o Mix Sanders Thompson, PLLC
1420 Fifth Avenue, Suite 220
Seattle, WA 98101

Ms. Chavez is the ex-wife of Plaintiff and may testify from personal knowledge as to all observations during the relevant time period.

12. Other associates, friends, and family of Plaintiff may be added to this list.

B. Description of Documents that Plaintiff May Use to Support His Claims

No.	Document	Bates No.
1.	Electronic communications between Mr. Kopal and Mr. Chavez	CHAVEZ00001-CHAVEZ00064

Plaintiff reserves his right to designate additional documents identified by any party, produced by any party in discovery, or disclosed to or provided to experts identified by any party.

C. Claim for Damages

Plaintiff seeks an appropriate award of back pay and front pay, together with all actual and compensatory economic damages, as well as noneconomic damages, a post-verdict award of all awardable expenses of litigation, interest, and reasonable attorneys' fees as allowed by law. To the best of Plaintiff's ability, and pending further investigation, ascertainable damages to date include the following:

Back Pay/Front Pay:	\$175,000.00
Lost Year Two Bonus:	\$12,000.00
Loss of Restricted Stock Units (RSUs):	\$120,686.67
General Damages:	\$200,000.00+

Documents supporting the foregoing are in the possession of Defendant. Plaintiff reserves the right to supplement this response.

D. Insurance Agreement Which May be Liable for Judgment

Not applicable.

Dated this 18th day of March, 2021. MIX SANDERS THOMPSON, PLLC

s/Michael G. Sanders
 Michael G. Sanders, WSBA No. 33881
 Brian (Heyun) Rho, WSBA No. 51209
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brian@mixsanders.com
 Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, Kelly Lee, hereby certify that on March 18, 2021 I caused to be served a true and correct copy of the foregoing DEFENDANTS' FRCP 26(a)(1) INITIAL DISCLOSURES via the method indicated below and addressed to the following:

Kevin Hamilton
Margo Jasukaitis
Perkins Coie, LLP
1201 3rd Avenue, Suite 4900
Seattle, WA 98101

Attorney for Defendant

☒ E-mail: KHamilton@perkinscoie.com;

MJasukaitis@perkinscoie.com

☒ CM/ECF Service

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

s/Kelly Lee

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